

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK**

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9384-2557 Québec Inc., a Canadian corporation; MINEDMAP, INC., a Nevada corporation; and SERENITY ALPHA, LLC, a Nevada limited liability, and other similarly situated individuals : 1:19-CV-00501-TJM-CFH

NOTICE RE: JUNE 8, 2020 HEARING

Plaintiff, :

against : **(ECF Case)**

NORTHWAY MINING, LLC, a New York limited liability company; MICHAEL MARANDA, an individual; MICHAEL CARTER, an individual; CSX4236 MOTORCYCLE SALVAGE, LLC, a New York limited liability company; DROR SVORAI, an individual; MINING POWER GROUP, INC., a Florida corporation; HUDSON DATA CENTER, INC, a New York Corporation, MICHAEL MARANDA, LLC, a New York Limited liability company; PORTER KING HILL CONTRACTING, LLC, a New York limited liability company; COINMINT, LLC, a Delaware limited liability company; OSWEGO DATA LLC, a New York Limited Liability Company; LORI S. THOMPSON, LCSW, PLLC, a professional limited liability corporation; LORI S. THOMPSON, an individual, ANTHONY PORTER, an individual; and DONALD D'AVANZO, an individual

Defendants. :
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Plaintiffs, MinedMap et. al., through counsel, T. Edward Williams, Esq., files this Notice Regarding the June 8, 2020 Hearing:

1. Defendants scheduled a hearing on their Motion to Dismiss for June 8, 2020.

Because Plaintiffs' Motion to Dismiss is based, in part, on the enforceability of a forum selection clause, Defendants seek to enter evidence that the agreements Defendants seek to provide are fraudulent, did not form the basis this lawsuit, and are being inserted into this lawsuit by Defendants and their counsel for the sole purpose of delaying this proceeding. To provide the foregoing evidence, Plaintiffs will call Craig Delsack, Esq., Québec, Inc.'s transactional attorney, Jason Girosan, Québec's CEO, and Allen Song, MinedMap and Serenity's CFO. The following witnesses will appear via telephone or by other electronic means.

2. In addition, given the emergency orders which were recently extended to June 13, 2020, the undersigned who lives and practices in New York City cannot take the train upstate, and so, seeks to appear via telephone, via Zoom, via Cisco Webex, or via any other medium available to the Court. *See, e.g.*, Executive Order [Cuomo] No. 202.31; *see also*, Gen. Ord. 61. If this Court cannot allow appearance by telephone then, as a prophylactic measure, the undersigned will submit a motion, consistent with this Court's Standing Order, to move the scheduled hearing beyond June 13, 2020 to allow for an in-person appearance.

Dated this 4th day of June 2020.
New York, New York

RESPECTFULLY SUBMITTED,

/s/ T. Edward Williams, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June 2020, this **NOTICE RE: JUNE 8, 2020** was served on the following individuals:

John Harwick, Esq. *via ECF*
Counsel for Maranda Defendants